UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK			
MICHAEL KANE, et al.,		:	
	Plaintiffs,	:	
- against -		:	Case No. 21-cv-7863 (VEC) (Lead)
DE BLASIO et al.,		:	
	Defendants.	: :	
MATTHEW KEIL, et al.		:	
	Plaintiffs,	:	
- against -		:	Case No. 21-cv-7863 (VEC)
THE CITY OF NEW YORK et al.,		:	
	Defendants.	: : X	

DECLARATION OF SARAH BUZAGLO

Sarah Buzaglo declares as follows, pursuant to 28 U.S.C. § 1746:

- 1. I am a named Plaintiff in the above-referenced consolidated action.
- 2. I respectfully submit this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction and Application for a Temporary Restraining Order.
- 3. I know the facts stated herein to be true based upon my personal knowledge, except for statements which are made on information and belief and, as to those, I verily believe them.

- 4. I have had a horrible cough since the beginning of March but have been unable to properly treat it after losing my health insurance with the NYC Department of Education ("DOE") as of February 18.
- 5. In March, my doctor recommended that I see a specialist, but I was unable to go because I could not afford to pay for it out of pocket.
- 6. On April 13, I applied for Medicaid, but it did not kick in until May 1.
- 7. Untreated, my cough worsened throughout April.
- 8. When I finally went to an allergist, I found out that I had developed a severe case of asthma, and that if I had waited a few more days I would have required hospitalization.
- 9. Medicaid did not fully cover the inhaler and nebulizer the allergist prescribed, so I was forced to accept charity to pay for them. Without these devices, I have coughing fits and have great difficulty breathing.
- 10. My inhaler will run out in 25 days, and I cannot afford to replace it.
- 11. After losing my job with the DOE, I have also struggled to pay my rent.
- 12. The only reason I have been able to continue living at my apartment since February is the charity of others. However, those who so kindly came to my aid can no longer help me pay.
- 13. I was forced to submit 30 days' notice to my landlord on May 15 as I can no longer afford my apartment.
- 14. My parents are moving to Israel next month so that my extended family living there can help care for my special needs brother.
- 15. This means I will be unable to stay with them.

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- 16. I am now being forced to decide whether to stay at a homeless shelter or move out of the country.
- 17. I am devastated at the thought of moving out of the United States where I have lived my entire life and leaving behind friends, community, years of study, a career, my students, and the life I have built here. However, I may have no other choice.
- 18. I pray that this Honorable Court will understand how devastated I am as a result of the City's actions.

Dated: New York, New York May 20, 2022

By: Sarah Buzaglo